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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANGEL AVILA,
aka "Fredo,"
aka "Quavo,"
aka "Marcos,"
aka "Papitas,"
OMAR AVILA SALMERON,
aka "Simón Hernández,"
aka "Andres,"
aka "El Palatero"
JOSE JAIME GARCIA,
aka "Pablo,"
aka "Sneaky,"
GABRIEL MICHEL BECERRA,
aka "Steven," and
JOSE ALFREDO MORENO GONZALEZ,

Defendants.

CR 2:24-CR-00461-FMO

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
JENA A. MACCABE

(UNDER SEAL)

The government hereby applies ex parte for an order that the indictment and any related documents in the above-titled case (except the arrest warrants for the charged defendants) be kept under seal

1 until the government files a "Report Commencing Criminal Action" in
2 this matter.

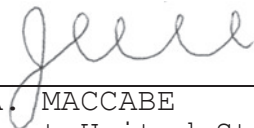
3 This ex parte application is made pursuant to Federal Rule of
4 Criminal Procedure 6(e)(4) and is based on the attached declaration
5 of Jena A. MacCabe.

6 Dated: July 30, 2024

Respectfully submitted,

7 E. MARTIN ESTRADA
8 United States Attorney

9 MACK E. JENKINS
10 Assistant United States Attorney
11 Chief, Criminal Division

12 
JENA A. MACCABE
Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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DECLARATION OF JENA A. MACCABE


I, Jena A. MacCabe, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. MIGUEL ANGEL AVILA, et al., the indictment in which is being presented to a federal grand jury in the Central District of California on July 30, 2024.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on July 30, 2024. The likelihood of apprehending one or more of the charged defendants might be jeopardized if the indictment in this case were made publicly available before the defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on July 30, 2024.


JENA A. MACCABE